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April 16, 2021

**VIA CM/ECF**

Hon. John Michael Vazquez, U.S.D.J.

United States District Court for the District of New Jersey

Frank R. Lautenberg Post Office & U.S. Courthouse

2 Federal Square

Newark, New Jersey 07102

**Re: *United States v. Centanni*,  
Civil Action No. 2:20-cv-10053-JMV-AME**

Dear Judge Vazquez:

This firm and the firm of Londa & Londa represent Defendant Joseph Centanni in this matter. We write to request entry of the enclosed proposed order staying this action for a period of six months. We have conferred in good faith with counsel for the United States about our request. The United States does not object to entry of the proposed stay order.

By way of background, the United States filed this civil suit against Mr. Centanni in August 2020. The government alleges that Mr. Centanni engaged in a pattern or practice of discrimination, and denied a group of persons the rights granted by the Fair Housing Act, 42 U.S.C. §§ 3601, *et seq.* by sexually harassing tenants and prospective tenants. [ECF No. 1] Mr. Centanni denies the government's allegations. [ECF No. 7]

On March 19, 2021, the Union County Prosecutor's Office filed thirteen criminal complaints against Mr. Centanni and arrested him at his office in Elizabeth. At the same time, the UCPO executed a search warrant on Mr. Centanni's office, seizing virtually all of his business records. As of this time, we have yet to receive a return of the documents or even an inventory of what was seized during that search. Mr. Centanni was detained at the Union County Jail until Thursday, March 25, 2021. There is significant overlap between the state criminal complaints and the allegations asserted by the United States in this civil action.

We believe that a stay of this matter will promote judicial economy and further the interests of justice. *See Walsh Securities v. Cristo Property Management, Ltd.*, 7 F. Supp. 2d 523 (D.N.J. 1998) (granting stay of civil matter pending the outcome of a criminal investigation that substantially overlapped with the allegations raised in the civil case). The United States does not object to

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entry of the enclosed proposed order, which contains a carve-out that will allow the government to pursue third-party subpoenas on certain organizations during the proposed six-month stay period.

The United States reserves the right to object to any further stay of this matter beyond the requested six-month period. We reserve the right to move the Court for an extension of the proposed stay if the circumstances warrant it.

Of course, we would be happy to answer any questions that Your Honor may have about our request. We thank the Court in advance for its consideration of this matter.

Respectfully submitted,  
s/ Joseph A. Hayden, Jr.

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cc: All Counsel of Record (via CM/ECF)